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From: Commander, Eighth Coast Guard District
To: Distribution

Subj: ACCEPTANCE OF RESCUE PLATFORMS IN LIEU OF A RESCUE BOAT ON OFFSHORE SUPPLY VESSELS (OSV)

Ref: (a) 46 CFR 94.10-55(b)
(b) Proposed Lifesaving Equipment Regulations (Subchapter L)

1. As requested in enclosure (1), this letter provides guidance to standardize Eighth District actions regarding the acceptance of rescue platforms as substitutes for a rescue boat on OSV's without a lifeboat.

2. Reference (a) grants OCMI's authority to accept the vessel as a rescue platform and substitute for a rescue boat. While this authority is limited to vessels under 100 gross tons, OCMI's have accepted this arrangement, following satisfactory operational tests, on OSV's of up to 500 gross tons.

3. An OSV of up to 500 gross tons may be accepted as a rescue platform and substitute for a rescue boat under the following conditions:

a. The vessel has demonstrated the ability to satisfactorily maneuver and recover an unconscious person from the water.

b. The distressed person can be adequately observed from the navigating bridge.

c. The vessel does not regularly engage in operations that restrict its maneuverability.

4. This policy is consistent with reference (b). Questions regarding this matter may be directed to CDR Tetreau, Chief, Merchant Vessel Safety Branch at (504) 589-6271.

J. W. CALHOUN
By direction

Encl: (1) MSO Morgan City ltr 16711 of 22 SEP 95

Dist: All Eights District MSOs, MSUs and MSDs

INSPECTION MEMO NO. 25A MSO MORGAN CITY ISSUED: DRAFT Aug 95

Subj: RESCUE BOATS ON OFFSHORE SUPPLY VESSELS

Ref: (a) 46 CFR 94.10-5(e)
(b) 46 CFR 160.056
(c) Inspection Memo No. 25, cancelled 24 May 1993
(d) NEWMS CIDIG Memo No. 52, 1 June 1990
(e) 33 CFR 143.405(a)(7)

Cancellations: None.

1. People occasionally fall overboard accidentally. Reference (a) requires vessels inspected under 46 CFR Subchapter I to normally have a rescue boat to enable removing even an unconscious person from the water. Lifeboats on large ships typically serve as the rescue boat. However, most OSVs do not carry lifeboats because liferafts and lifefloats are used as primary lifesaving equipment.

2. Reference (a) stipulates the consideration of vessel size, service, arrangement and crew requirements when determining appropriate recovery and rescue boat provisions. Most OSVs have only 4 or 5 crew required and little open area off of the cargo deck on which to mount a boat type davit. Freeboard is often on the order of 2 or 3 feet. Twin screws allow fairly good maneuverability.

3. Reference (a) specifies reference (b) as the standard for rescue boats on vessels in service on protected waters, and states for other waters that a more substantial boat is appropriate, with details and testing to the satisfaction of the cognizant OCMI. What constitutes an appropriate rescue boat for a typical OSV has been an issue at least since OSVs were first required to be certificated in 1980. Expectations have varied among marine safety offices and from time to time within a given office. Research of historical records revealed a few cases where CCGD8 allowed the vessel to serve as its own rescue boat, based on demonstrating effective rescue capabilities.

4. Most OSVs built in the oil boom years, before 1984, were provided with a metal "jon" boat about 14 feet in length. They were often stowed against the back side of the accommodations. A fishhook davit was often fitted for manual launching and retrieving, without persons in the boat. NVIC 8-91, in addressing liftboats as OSVs, reaffirms Commandant expectations that OSVs do not need davits so that people may be lowered or raised in a rescue boat. Few OSVs were built in the latter 1980s and the construction pace of the oil boom years has yet to return.

5. Reference (c) was written to acknowledge the improvement in inflatable boats over the last decade. The 1983 amendments to SOLAS address inflatable rescue boats and many small ships now use them. Reference (c) required upgrading existing installations to include davit launching and recovery, as well as setting a four hour/six knot endurance, using SOLAS as a reference. The policy was quickly cancelled upon industry objection.

6. Reference (a) describes a rescue boat as a small, lightweight, rigid boat with built-in buoyancy and capable of being readily launched and easily maneuvered. Reference (b) specifications incl

OCMI review of drawings	open rowboat design with 3 thwarts
length of 11 to 14 feet	3 person minimum capacity
one pair of oars	one painter

buoyant foam in a quantity from a formula
testing: 10 foot drop, 350# on gunwale, 5" freeboard with a person laying on the transom

7. Reference (d) recognizes the design and operating limitations for using rescue boats on OSVs and the advantages of modern inflatable boats. It allows the use of any equipment as a substitute for a rescue boat, provided a 165 pound object can be efficiently recovered. A demonstration to the OCMI is necessary. OCMI New Orleans can require a portable platform, which can be handled by two persons and instructions on its use must be posted. Reference (d) also lists Avon and Zodiac inflatables, as well as a fiberglass Boston Whaler, that are acceptable as OSV rescue boats in the NEWMS zone. Each is to be fitted with a motor of about 35 HP.

8. Reference (e) provides for recovery of personnel from offshore platforms and MODUs onto a standby vessel. Any means of retrieving helpless persons from the water is acceptable, based on a satisfactory demonstration to the OCMI. This fairly recent regulation is in line with policy on large freeboard crewboats, where a rescue platform is often used.

9. Many OSV crews indicate a strong hesitation to use rescue boats, especially the traditional jon boat but also the modern inflatables They feel that using the OSV as its own rescue platform is quicker, safer and more reliable.

10 Most OSVs delivered in this zone in recent years were inspected by Detachment personnel. Inspectors compared the use of rescue boats to rescue platforms and found platforms can be at least as effective as boats. It was noted that too few crew may exist to properly launch and retrieve boats.

11. Existing vessels may continue with existing rescue boat provisions. There is insufficient evidence to indicate that rescue boat standards should not be grandfathered. Upcoming Subchapters L and W are expected to retain the basic requirement for a rescue boat, but allow OSVs to be exempt from the requirement. Conditions for the exemption will likely include provisions for an equivalent level of safety.

12. Owners of new vessels must propose a method for recovery of a person from the water, including an unconscious person. In all cases, the method must be demonstrated as effective and efficient, using the attached guidance. Equipment such as a Lifesling, a Jason's Cradle or a rescue platform can be accepted in lieu of the rescue boat required by reference (a), provided it is demonstrated to be satisfactory. These alternatives may be safer, more efficient and less costly than a rescue boat. The rescue boat or its equivalent should be described on the

PERFORMANCE CRITERIA: SUBSTITUTIONS FOR OSV RESCUE BOATS

1. The appliance, or vessel itself, must be capable of retrieving an unconscious 200 pound person. Normally checked with deadweight. Always checked with the vessel underway.

2. The lapsed time from first calling "man overboard" until the body is on board the vessel shcould not exceed 10 minutes, in the test condition, which will typically be calm waters.

3. The operation of the appliance requires no more than the minimum number of crew required by the COI, less one person who is operating the vessel controls.

4. The appliance must be able to be used on both sides of the vessel.

5. The vessel must have appropriate modifications completed to provide storage for, and use of, the appliance and any related equipment.

6. The appliance must be adjustable as necessary to be functional at all operational drafts of the vessel.

7. The appliance and any related equipment must enable transfer of the retrieved person to the main deck of the vessel.

8. Operation of the appliance and any related equipment must no unduly hazard the crew or the person being retrieved. Movable parts must be arranged so they do not move inadvertently when exposed to moderate sea conditions.